

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ePLUS, INC. : Civil Action No.
vs. : 3:09CV620
LAWSON SOFTWARE, INC. : January 12, 2011

COMPLETE TRANSCRIPT OF THE JURY TRIAL

BEFORE THE HONORABLE ROBERT E. PAYNE

UNITED STATES DISTRICT JUDGE, AND A JURY

APPEARANCES:

Scott L. Robertson, Esquire
Michael G. Strapp, Esquire
Jennifer A. Albert, Esquire
David M. Young, Esquire
Goodwin Procter, LLP
901 New York Avenue NW
Suite 900
Washington, D.C. 20001

Craig T. Merritt, Esquire
Christian & Barton, LLP
909 East Main Street
Suite 1200
Richmond, Virginia 23219-3095
Counsel for the plaintiff

Peppy Peterson, RPR
Official Court Reporter
United States District Court

1 APPEARANCES: (cont'g)

2 Dabney J. Carr, IV, Esquire
3 Troutman Sanders, LLP
4 Troutman Sanders Building
1001 Haxall Point
Richmond, Virginia 23219

5 Daniel W. McDonald, Esquire
Kirstin L. Stoll-DeBell, Esquire
6 William D. Schultz, Esquire
Merchant & Gould, PC
7 80 South Eighth Street
Suite 3200
8 Minneapolis, Minnesota 55402

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 browser and hits the search button, the search term is conveyed
2 as part of a request to the server side components which causes
3 the Lawson 4GL COBOL program called RQIC to be executed. The
4 RQIC program ultimately performs a search of the keyword detail
5 table for occurrences of that term that have been previously
6 indexed.

7 Any matching records from the keyword detail table are
8 then used to find the corresponding items in the ITEMMAST table
9 and data gets gathered from the PO and ITEMLOC tables. All of
10 those results are formatted as XML and ultimately returned to
11 the item web browser and formatted as a search word.

12 Q When the search code searches the keyword tables to locate
13 the keywords that the user typed in, does the source code
14 search the item master table at all?

15 A No, it does not. It only searches the keyword detail
16 table and the associated keyword tables.

17 Q Now, I'd like to turn to the functionality for the adding
18 items to a shopping cart and building a requisition. Does the
19 source code of the Lawson system implement functionality that
20 allows a user to select desired items for requisition from a
21 list of results returned from either this category or keyword
22 search that you discussed?

23 A Yes, it implements a shopping cart functionality whereby
24 the user can indicate that an item from a search result should
25 be added to the shopping cart. Items can be added and removed

1 until checkout operation is performed. Similar to the way you
2 shop on Amazon or another web business.

3 Q Now, what, if any, database tables are involved in this
4 shopping cart functionality?

5 A There are three. Two of them are prefixed with the term
6 REQ. One is called REQHEADER and the other is called REQLINE.
7 The third is called PO interface which we mentioned before,
8 POITERFAC.

9 Q And what information is stored in that REQLINE table
10 that's relevant to the shopping cart functionality?

11 A The REQLINE table holds the individual line items
12 representing items that were selected to be added to the
13 shopping cart.

14 Q Does this REQLINE table also contain a status field?

15 A Yes, it does. In addition to the item information, it
16 contains a status which can indicate that the item is either --
17 while in the shopping cart, it's in a state called unreleased.

18 Q What does that mean?

19 A It means that it is part of a shopping cart and not yet
20 part of a requisition.

21 Q And is there another status that can be indicated in this
22 status field in addition to the unreleased status that you
23 mentioned?

24 A Yes. So I'd just say both the REQLINE and REQHEADER table
25 that I mentioned which are involved in this contain a status

1 field which indicates the disposition of the information,
2 whether it's part of the shopping cart or whether it's part of
3 requisition, that the two values can be what's called
4 unreleased or released.

5 It indicates it's either in a status of unreleased or
6 released where unreleased is the status used while the items
7 are in the shopping cart, and released is -- indicates that
8 they are now part of the requisition.

9 Q What information is stored in that REQHEADER table that's
10 relevant to the shopping cart function?

11 A The REQHEADER table represents the shopping cart as a
12 whole in this case, and it groups the REQLINE records together.

13 Q Can you explain how this shopping cart functionality is
14 implemented in the source code?

15 A Yes. So as the user indicates that they would like to add
16 an item to the shopping cart, when the user indicates the item
17 should be added to the shopping cart, the item number for that
18 item is conveyed as part of a request to the server side at
19 which point a Lawson 4GL COBOL program is executed to add a
20 line to the REQLINE, add a record to the REQLINE table
21 corresponding to that item.

22 Q Have you created some demonstrative to show what happens
23 in the source code when the user clicks on the checkout button
24 after he has added items to the shopping cart?

25 A Yes, there should be two.

Niemeyer - Direct

1249

1 MS. ALBERT: Mike, can we go first to slide 25,
2 please.

3 Q Now, using these demonstratives, would you please explain
4 what happens in the source code when the user clicks on that
5 checkout button after he's added items to the shopping cart?

6 A So when a user clicks on the checkout button, there's two
7 major -- two phases that happen, and this depicts the first.

8 If at this point a requisition header, REQHEADER record
9 has not previously been created, one will be created at this
10 time. This happens when a request is made from the client's
11 web browser to the server side causing the Lawson COBOL program
12 RQIB, or create requisition header which is shown here, to be
13 executed. That program adds a record to the REQHEADER table.

14 Q What is a requisition header?

15 A Again, in this case, it represents either the shopping
16 cart as a whole or the requisition as a whole. It serves to
17 group the requisition lines and to contain a status for the
18 overall shopping cart or requisition.

19 MS. ALBERT: Mike, can we go to slide 26, please.

20 Q So now can you explain what happens in the source code in
21 the next step in this process?

22 A In this step, there are two activities of importance.
23 This, again, is happening after the user has clicked the
24 checkout button. Request is -- second request is made from the
25 client's browser to the server side. In this case, the Lawson

Niemeyer - Direct

1250

1 4GL COBOL program called RQIF, or release requisition, is
2 invoked.

3 Its first job is to update the status that I mentioned
4 before in both the REQHEADER and REQLINE tables from an
5 unreleased to a released value. The second step is to create
6 records in the PO interface table, POINTERFAC table, which make
7 those records, make that information then available to the
8 purchase order system.

9 Q Are records created in this PO interface table at the time
10 when items are initially added to the shopping cart?

11 A No. They are only created after the checkout operation is
12 performed.

13 Q Are the records in the REQHEADER and REQLINE tables
14 available to the purchase order system prior to that checkout
15 button being pressed?

16 A No, they are made available by virtue of the records in
17 the PO interface table.

18 Q Now I'd like to turn to the process for generating a
19 purchase order. Does a source code of the Lawson system
20 implement functionality that generates one or more purchase
21 orders corresponding to the items listed in a requisition built
22 using the Lawson system?

23 A Yes, it does. The user can use a program called PO 100 to
24 generate one or more purchase orders from a requisition.

25 Q Does the source code indicate anything about when multiple